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MEMORANDUM FOR: Acting Chief, Regulations Control Staff

SUBJECT : Special Procedure for Approval of Certain Regulatory
Issuances

1. Returned herewith is the memorandum which you submitted, seeking the Director's concurrence in a change in the manner of securing his approval on those regulations which he must personally sign. I do not feel that the proposal in its present form would be accepted by the Director.

2. I would like for you to explore the possibility of establishing an alternative procedure, one which would call for the preparation of a memorandum for signature of the DCI, addressed to the Deputy Director (Support), which would outline the particular policy under consideration or perhaps delegation of DCI authorities to specific officers, and which would ask the Deputy Director (Support) to incorporate these provisions in appropriate regulations issued by the Deputy Director (Support). Having the Director establish policy or approve principles in this manner would give the Deputy Director (Support) a certain amount of flexibility in developing language to implement the Director's policy, and the Deputy Director (Support) could thus make language and procedural changes from time to time without the necessity of DCI approval, as long as the principles were not violated.

3. I wonder whether this approach might not be more satisfactory than having the Director approve specific language in each instance. It would seem to me that each time language changes were deemed necessary we would, under the original proposal, have to go back to him for signature on the amendments.

4. I would be glad to talk with you and [REDACTED] on this, and would appreciate being advised if there are substantive reasons why the alternative method I have suggested is not feasible.

5. One further thought - in preparing a paper for submission to the Director, I think we ought to include an exhibit demonstrating how this procedure would work out in a particular instance, and we should probably establish basic principles and perhaps procedures for distributing and retaining copies of the approvals received from the Director in this manner. There are several questions here which might bear scrutiny. For example, should the Deputy Director (Support) or the Regulations Control Staff be the point of retention on authorizations of this sort? Should the Comptroller and the General Counsel also be furnished evidence of the Director's delegation of authority?

H. GATES LLOYD
Assistant Deputy Director
(Support)

Attachment

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